Entergy Operations, Inc.
1448 S.R. 333
Russellville, AR 72802
Tel 479-858-4704

Stephenie L. Pyle
Manager, Regulatory Assurance
Arkansas Nuclear One

1CAN111602

November 16, 2016

U.S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, DC 20555

SUBJECT: Fifth Ten-Year Interval Inservice Testing Program
Relief Request VRR-ANO1-2017-1
Arkansas Nuclear One – Unit 1
Docket No. 50-313
License No. DPR-51

REFERENCE: NRC Letter to Entergy Operations, "Arkansas Nuclear One, Unit No. 1 – Approval of Relief Request for Arkansas Nuclear One Unit 1 Fourth 10-Year Pump and Valve Inservice Testing Program (TAC Nos. MD7709 and MD7710)," dated April 30, 2008 (ML081130082)

Dear Sir or Madam:

Pursuant to 10 CFR 50.55a(z)(2), Entergy Operations, Inc. (Entergy) requests approval of the attached Relief Request VRR-ANO1-2017-1 for the Arkansas Nuclear One, Unit 1 (ANO-1) Fifth Ten-Year Interval Inservice Testing Program. The fifth ten-year interval is scheduled to begin December 1, 2017, and conclude on November 30, 2027.

Entergy requests relief from ASME OM Code-2004 Edition, with addenda through OMb Code-2006 Addenda, Appendix I, Paragraph I-8200 "Seat Tightness Testing. Seat tightness testing shall be performed in accordance with the Owner's valve test procedure." This relief request is for the relief valve for the ANO-1 sodium hydroxide storage tank. As an alternative, the seat leakage test of this vacuum breaker valve will not be performed. Based on the determination that compliance with the ASME OM Code-2004 Edition, with addenda through OMb Code-2006 Addenda, requirements results in an unusual difficulty without a compensating increase in the level of quality or safety, this proposed alternative should be granted pursuant to 10 CFR 50.55a(z)(2). The details of the request are provided in the attached Relief Request VRR-ANO1-2017-1.

This alternative is a re-submittal of the ANO-1 Fourth Ten-Year Interval Relief Request VRR-ANO1-2007-1. That relief request was approved by the NRC in the reference above.

This letter contains no new regulatory commitment.

If you have any questions concerning this submittal, please contact me.

Sincerely,

ORIGINAL SIGNED BY DAVID B. BICE ACTING REGULATORY ASSURANCE MANAGER FOR STEPHENIE L. PYLE

SLP/rwc

Attachment: Request for Relief - VRR-ANO1-2017-1

cc: Mr. Kriss Kennedy
Regional Administrator
U. S. Nuclear Regulatory Commission, Region IV
1600 East Lamar Boulevard
Arlington, TX 76011-4511

NRC Senior Resident Inspector
Arkansas Nuclear One
P.O. Box 310
London, AR 72847

U. S. Nuclear Regulatory Commission
Attn: Mr. Thomas Wengert
MS O-08B1
One White Flint North
11555 Rockville Pike
Rockville, MD 20852

Attachment to

1CAN111602

Request for Relief
VRR-ANO1-2017-1

Request for Relief
VRR-ANO1-2017-1

1. American Society of Mechanical Engineers (ASME) Code Component(s) Affected

Valve ID	Function	Category	Class
PSV-1617	NAOH TANK PRESSURE/VAC RELIEF	C	3

2. Applicable ASME Code Edition and Addenda

ASME Code for Operations and Maintenance of Nuclear Power Plants (OM Code) 2004 Edition, with addenda through OMb-2006

3. Applicable Code Requirement(s)

ASME OM Code-2004 Edition, with addenda through OMb Code-2006 Addenda, Appendix I, Paragraph I-8200:

> "Seat Tightness Testing" - Seat tightness testing shall be performed in accordance with the Owner's valve test procedure."

4. Reason for Request

Relief valve PSV-1617 has an active open safety function to relieve overpressure and vacuum conditions in the sodium hydroxide storage tank. Note that although the tank vent valve AV-10 is normally open to perform these functions, PSV-1617 is considered to be the primary and most reliable mechanism for performing this function. The seat leakage testing of PSV-1617 produces no useful information since PSV-1617 has no significant safety function in the closed position.

5. Proposed Alternative and Basis for Use

Seat leakage testing of this vacuum breaker valve, PSV-1617, will not be performed. This vacuum breaker valve, PSV-1617, has no significant safety function in the closed position. Furthermore, seat leakage is irrelevant since, in effect, PSV-1617 is normally bypassed by a line with a normally-open vent valve, AV-10.

Based on the determination that compliance with the ASME OM Code-2004 Edition, with addenda through OMb Code-2006 Addenda, requirements results in a hardship without a compensating increase in the level of quality or safety, this proposed alternative should be granted pursuant to 10 CFR 50.55a(z)(2).

6. Duration of Proposed Alternative

Arkansas Nuclear One, Unit 1's Fifth Ten-Year Inservice Testing Interval (December 1, 2017, through November 30, 2027).

7. Precedent

This alternative is a re-submittal of the ANO-1 Fourth Ten-Year Interval Relief Request VRR-ANO1-2007-1. That relief request was approved by the NRC in letter dated April 30, 2008 (ML081130082).

The previous relief request was based on the ASME OM Code 2001 Edition with addenda through OMb-2003 Addenda. This Fifth Ten-Year Interval relief request is based on the ASME OM Code-2004 Edition, with addenda through OMb Code-2006 Addenda. There have been no substantive changes to this relief request, to the OM Code requirements or to the basis for use, which would alter the previous NRC Safety Evaluation conclusions.